

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LYNETTE BOOTH, BARBARA FORD, and
PHILIP FAVIA, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

PACIFIC WEBWORKS, INC., a Nevada
corporation, THE QUAD GROUP, LLC, a Utah
limited liability company, and BLOOSKY
INTERACTIVE, LLC, a California limited liability
company, INTERMARK COMMUNICATIONS,
INC., a New York corporation,

Defendants.

Case No. 09-cv-07867

Consolidated with Case No. 1:11-cv-08561

Honorable Joan H. Lefkow

Magistrate Judge Morton Denlow

**STIPULATION TO REMAND ACTION
TO THE CIRCUIT COURT OF COOK COUNTY**

Plaintiffs Lynette Booth and Barbara Ford (“Plaintiffs”) and Defendants Pacific Webworks, Inc, The Quad Group, LLC, and Bloosky Interactive, LLC (“Defendants,” collectively “the Parties”), by and through their undersigned counsel, hereby stipulate and agree to remand the action captioned *Booth, et al. v. Pacific WebWorks, Inc., et al.*, Case no. 1:11-cv-08651 (the “Action”), which has been related and consolidated with Case no. 1:09-cv-07687 before this Court, to the Circuit Court of Cook County, Illinois. In support of the instant stipulation, the Parties state as follows:

WHEREAS, the Action was originally filed in the Circuit Court of Cook County, Illinois, County Department, Chancery Division;

WHEREAS, on December 1, 2011, the Quad Group removed the Action to the United States District Court for the Northern District of Illinois;

WHEREAS, by Order entered December 29, 2011, the Court related and consolidated the Action with Case no. 1:09-cv-07687 pending before it;

WHEREAS, the Parties have reached a class action settlement that, if finally approved, will fully and finally resolve all claims asserted against Defendants in the Action;

WHEREAS, the Parties have reduced their settlement to a written settlement agreement and the agreement has been executed in full;

WHEREAS, the Parties' settlement agreement contemplates effectuation of the settlement in the Circuit Court of Cook County, Illinois, where the Action was originally filed;

WHEREAS, the Parties have conferred and agreed that, in accordance with their settlement agreement, the Action should be remanded to the Circuit Court of Cook County, Illinois for all further proceedings; and

WHEREAS, the Parties have further agreed that the remand contemplated herein shall be *without prejudice* to Defendants' rights pursuant to 28 U.S.C. §§ 1446 and 1453;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. The Action captioned *Booth, et al. v. Pacific WebWorks, Inc., et al.*, Case no. 1:11-cv-08651, which has been related and consolidated with Case no. 1:09-cv-07687, shall be remanded to the Circuit Court of Cook County, Illinois, County Department, Chancery Division;
2. Remand of the Action shall be *without prejudice* to Defendants' rights pursuant to 28 U.S.C. §§ 1446 and 1453;
3. The Clerk of the Court shall mark the Action as closed; and
4. The Action captioned *Ford, et al. v. Pacific WebWorks, Inc., et al.*, Case no. 1:09-cv-07687, shall not be remanded and shall remain with this Court.

IT IS SO STIPULATED.

LYNETTE BOOTH and BARBARA FORD,
individually and on behalf of all others similarly
situated,

Dated: June 8, 2012

By: /s/ Rafey S. Balabanian
One of Plaintiffs' Attorneys

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PACIFIC WEBWORKS, INC.,

Dated: June 8, 2012

By: /s/ Robert E. Mansfield
One of Defendant's Attorneys

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THE QUAD GROUP, LLC,

Dated: June 8, 2012

By: /s/ Robert E. Mansfield
One of Defendant's Attorneys

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BLOOSKY INTERACTIVE, LLC,

Dated: June 8, 2012

By: /s/ Ari N. Rothman
One of Defendant's Attorneys

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IT IS SO ORDERED.

ENTERED: _____

HONORABLE JOAN H. LEFKOW
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Rafey S. Balabanian, an attorney, hereby certify that on June 8, 2012, I served the above and foregoing ***Stipulation to Remand Action to the Circuit Court of Cook County***, by causing a true and accurate copy of such paper to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system, on this the 8th day of June 2012.

/s/ Rafey S. Balabanian